

Hazardous Materials Bulletin

GASOLINE TRANSPORTATION

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Generally, gasoline is fully regulated in the FHMR. There are a couple of exceptions to that statement. First, it may be transported as a limited quantity, with each inner package not exceeding 0.3 gallons (1 liter), and as such is excepted from labeling, placarding, and specification packages (Section 173.150(b)). The second exception is Materials of Trade (MOTs). As a Packing Group II material, each can of gasoline may not exceed a capacity of 8-gallons. With a gross maximum of 440 lbs., that's about nine 8-gallon cans, assuming there is no other MOTs on the vehicle. The containers must be metal or plastic and either conform to USDOT specifications or OSHA standards. Most gasoline cans found in hardware stores meet the OSHA standards. The container must be marked, "Gasoline". Any containers of gasoline in excess of 8-gallons capacity must be in compliance with the FHMR. See the Hazardous Material Bulletin titled Materials of Trade (Volume 3, No. 5) for more information on the provisions of this exception.

In any container exceeding 8-gallons capacity, gasoline must be transported in compliance with the regulations. **Any container of gasoline over 8-gallon capacity must be a USDOT specification package. The use of dispensing tanks, while commonly seen in construction and agricultural use, are prohibited for gasoline.** In addition, for containers over the 8-gallon limit, shipping papers, package markings and package labels are required (Sections 172.200, 172.300, and 172.400, respectively). The training requirements must also be complied with (Section 172.700). If the capacity of package exceeds 119 gallons, or the total gross weight of all the gasoline packages exceed 1000 lbs., placards are required (Section 172.500).

In regards to specification packages, the reuse and testing requirements of Section 173.28 must be met for non-bulk packages, and the qualification requirements of Part 180 must be met for bulk packages (capacity of over 119 gallons). Section 173.8 was not adopted by the Michigan Legislature prior to October 1, 1998, and that section does not apply in Michigan. There is no provision in Michigan law that permits the use of a non-specification tank for gasoline in commercial transportation.

Generally speaking, Section 173.28 requires all non-bulk packages must be inspected after each use. Any incompatible residue, rupture, or other damage affecting its structural integrity disqualifies the package. Additionally, most packages must be subjected to the leakproofness test after each use. There are two exceptions; specification packages made of stainless steel, monel, or nickel do not have to be retested unless they have a thickness of less than one and one-half times their required minimal thickness, and specification plastic packages do not have to be retested until 5 years from the date of manufacture (§ 173.28(a)(7)).

All gasoline packages, including MOTs and limited quantities, must be secured from movement in the vehicle and must be securely closed. **Gasoline packages may not be transported with pumps in place unless the package was design tested with the pump in place.** Placing a pump on a drum changes the design type and requires new design tests (§178.504, 178.601).

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